

SANDERS LAW GROUP

Craig Sanders, Esq. (Cal Bar 284397)
Jacqueline Mandel, Esq. (Cal Bar 317119)
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File No.: 129236

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

Michael Stewart,

Plaintiff,

v.

Project 1920, Inc,

Defendant.

Case No. 5:24-cv-00884-PCP

**DECLARATION OF JACQUELINE
MANDEL, ESQ. REGARDING
EFFORTS TO SERVE
DEFENDANT**

JACQUELINE MANDEL, ESQ., pursuant to 28 U.S.C. §1746, hereby declares under penalty of perjury, as follows:

1. I am an attorney duly admitted to practice law before this Court and I am an associate attorney of Sanders Law Group, attorneys for the Plaintiff in this action. As such, I have personal knowledge of all facts and circumstances upon which this Declaration is based, except for those facts and circumstances set forth upon information and belief and, as to those facts, I believe them to be true, based upon conversations with my client, review of my file, and my personal involvement

1 in this case.

2 2. I am submitting this declaration in response to the Court's May 16,
3 2024 Order after the Initial Case Management Conference. (*Dkt. No.* 16).

4 3. After the May 16, 2024 Initial Case Management Conference, our
5 office made several attempts to contact Defendant.

6 4. On May 23, 2024, our office mailed a copy of Plaintiff's Notice of
7 Motion and Motion for Default Judgment and supporting documents to Defendant
8 at 5684 Bay Street, Suite 665, Emeryville, California 94608 and 881 Parma Way,
9 Los Altos, California 94024.

10 5. On May 23, 2024, our office messaged a copy of Plaintiff's Notice of
11 Motion and Motion for Default Judgment and supporting documents to
12 Defendant's Instagram account @Senreve and to Defendant's founder and
13 CEO, Coral Chung's Instagram account @Coralllista.

14 6. On June 3, 2024, our office received an electronic correspondence from
15 Coral Chung. *Attached hereto as Exhibit 1 are true and accurate correspondence*
16 *between Defendant's principal and our office.* Ms. Chung stated that they never
17 received the demand letter and requested it be resent. *Id.*

18 7. I sent a copy of the demand letter our office sent prior to filing the
19 lawsuit along with a copy of the Complaint to Ms. Chung. *Id.* I advised her that we
20 had tried numerous times to contact her with no response. *Id.* I also notified her of
21 the June 13, 2024 Motion for Default Judgment hearing. *Id.*

22 8. Ms. Chung replied that the image had been removed from the website
23 and she inquired into what we were "looking for". *Id.*

24 9. I informed Ms. Chung that Plaintiff's legal rationale and demand was
25 set forth further in Plaintiff's Motion for Default Judgment. *Id.*

26 10. As Ms. Chung did not respond to my last correspondence, on June 5,
27 2024, I inquired if Defendant intended to oppose or otherwise appear for the Motion
28

1 for Default Judgment hearing scheduled for June 13, 2024. *Id.* Ms. Chung responded
2 “yes”, however, she did not advise if Defendant hired an attorney or if an opposition
3 would be filed.

4 11. I swear that the foregoing is true and correct under penalty of perjury
5 pursuant to the laws of the State of California and of the United States of America.

6 DATED: June 5, 2024

7
8 /s/ Jacqueline Mandel
9 Jacqueline Mandel, Esq. (Cal Bar 317119)

EXHIBIT 1

 SIG SANDERS
LAW GROUP

Jacqueline Mandel

To: Coral Chung
Cc: Craig Sanders
Subject: RE: 5:24-cv-00884-PCP_Michael Stewart v. Project 1920, Inc. d/b/a Senreve_Plaintiff's Motion for Default Judgment

Jacqueline Mandel, Esq.

SANDERS LAW GROUP

333 Earle Ovington Boulevard | Suite 402 | Uniondale, NY 11553

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Email: jmandel@sanderslaw.group

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From: Coral Chung <coral@senreve.com>
Sent: Wednesday, June 5, 2024 12:07 PM
To: Jacqueline Mandel <jmandel@sanderslaw.group>
Cc: Craig Sanders <csanders@sanderslaw.group>
Subject: Re: 5:24-cv-00884-PCP_Michael Stewart v. Project 1920, Inc. d/b/a Senreve_Plaintiff's Motion for Default Judgment

Yes

CORAL CHUNG

FOUNDER & CEO | **SENREVE**

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[Reflections on COVID-19](#)

[Remembering My First Met Gala](#)

On Jun 5, 2024, at 7:53 AM, Jacqueline Mandel <jmandel@sanderslaw.group> wrote:

Hi Coral,

Does Defendant intend to oppose or otherwise appear for the Motion for Default Judgment hearing scheduled for June 13, 2024?

Jacqueline Mandel, Esq.

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Fax: 516.282.7878

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From: Jacqueline Mandel

Sent: Monday, June 3, 2024 4:11 PM

To: 'Coral Chung' <coral@senreve.com>

Cc: Laura Costigan <lcostigan@sanderslaw.group>; Craig Sanders <csanders@sanderslaw.group>

Subject: RE: 5:24-cv-00884-PCP_Michael Stewart v. Project 1920, Inc. d/b/a Senreve_Plaintiff's Motion for Default Judgment

Coral,

What we are seeking and the legal rationale for the same are set forth in our Motion for Default Judgment in which we ask the Court to award statutory damages and attorney's fees and costs in the amount of \$15,816.

Jacqueline Mandel, Esq.

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Fax: 516.282.7878

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From: Coral Chung <coral@senreve.com>

Sent: Monday, June 3, 2024 4:06 PM

To: Jacqueline Mandel <jmandel@sanderslaw.group>

Cc: Laura Costigan <lcostigan@sanderslaw.group>; Craig Sanders <csanders@sanderslaw.group>

Subject: Re: 5:24-cv-00884-PCP_Michael Stewart v. Project 1920, Inc. d/b/a Senreve_Plaintiff's Motion for Default Judgment

Hi Jacqueline,

The image includes a product that is discontinued (has been for several years). The image has been removed from the website and has not generated any sales. What exactly are you and your client looking for?

CORAL CHUNG
FOUNDER & CEO | **SENREVE**

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[Remembering My First Met Gala](#)

On Jun 3, 2024, at 12:55 PM, Jacqueline Mandel
<jmandel@sanderslaw.group> wrote:

Hi Coral,

Attached is the letter our office sent prior to filing the lawsuit. Also attached is a copy of the Complaint that was filed on February 14, 2024. We have tried numerous times to contact you, but we received no response. There is now a hearing on June 13, 2024 for Plaintiff's Motion for Default Judgment.

Jacqueline Mandel, Esq.
SANDERS LAW GROUP

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From: Coral Chung <coral@senreve.com>

Sent: Monday, June 3, 2024 3:49 PM

To: Laura Costigan <lcostigan@sanderslaw.group>

Cc: Jacqueline Mandel <jmandel@sanderslaw.group>; Craig Sanders
<csanders@sanderslaw.group>

Subject: Re: 5:24-cv-00884-PCP_Michael Stewart v. Project 1920, Inc. d/b/a
Senreve_Plaintiff's Motion for Default Judgment

Hi Laura,

We have never received the demand letter. Can you send that again please.

On Tue, May 7, 2024 at 11:16 AM Laura Costigan

<lcostigan@sanderslaw.group> wrote:

Good Afternoon,

I write on behalf of counsel for the Plaintiff, Michael Stewart, in the above-referenced matter against Defendant, Project 1920, Inc. d/b/a Senreve. This matter is currently pending in the United States District Court for the Northern District of California.

Attached to this communication, please find copies of the Plaintiff's Notice of Motion for Default Judgment, The Declaration of Jacqueline Mandel, Esq. in Support, the Declaration of Michael Stewart in Support, the Memorandum of Points and Authorities in Support, and the Proposed Judgment on the Motion for Default Judgment filed at Docket numbers 11 – 11-4.

Respectfully,

Laura Costigan | Head Paralegal

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--

CORAL CHUNG

Founder & CEO | **S E N R E V E**

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<Exhibit 2.pdf>

<Demand Letter - Senreve.pdf>

<Complaint - Senreve.pdf>

<Exhibit 1.pdf>